

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION

IN RE: : Case No.: 5:18-04224 (HWV)
GINA ANN FIDACARO : Chapter 13
Debtor(s) :
ACAR LEASING LTD d/b/a :
GM FINANCIAL LEASING :
Movant :
v. :
GINA ANN FIDACARO :
Respondent(s) :
JACK N. ZAHAROPOULOS :
Trustee :
:

ANSWER TO MOTION FOR RELIEF OF
ACAR LEASING LTD d/b/a GM FINANCIAL LEASING
ON BEHALF OF RESPONDENT

AND NOW COMES Respondent, by and through her attorneys, Newman Williams, P.C., and in Answer to the Motion of ACAR LEASING LTD d/b/a GM FINANCIAL LEASING for Relief from Stay avers:

1. Admitted.
2. Admitted.
3. Admitted in part and denied in part. It is admitted as to the date of the contract and the type of vehicle. The remaining allegations are denied as statements or conclusions of law or requests for relief. By way of further answer, Movant has failed to produce the assignment demonstrating it is in fact a real party-in-interest.
4. Admitted to all averments except the value of the vehicle. Debtor is without knowledge sufficient to respond to this allegation.

5. Denied. The lease was to mature in May 2021 but Debtor turned the vehicle in early in March 2021 at the dealership where she acquired the vehicle (W. S. HEALEY CHEVROLET BUICK INC). Debtor completed all payments under the terms of the lease agreement.

WHEREFORE, Respondent respectfully requests this Honorable Court for an Order that the Motion of ACAR LEASING LTD d/b/a GM FINANCIAL LEASING for Relief from Stay be denied, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS P.C.

By: /s/ Robert J. Kidwell

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